



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Maurice Richardson, President  
Engraph, Inc.  
for Engraph, Inc.  
5100 Hidden Branches Circle  
Atlanta, GA 30338

RE: General Notice Letter  
Omega Superfund Site

Dear Maurice Richardson:

The purpose of this letter is to provide you notice of your potential liability under the Comprehensive Environmental Response Compensation Liability Act (CERCLA), as amended, at the Omega Chemical Superfund Site (the "Site"). In addition, the United States Environmental Protection Agency ("EPA") is inviting you to attend an informational meeting regarding the Site which will occur on September 17, 2002, at the Sheraton Gateway Hotel near the Los Angeles Airport. At that time, you will also have the opportunity to meet the established working group – the Omega Chemical Site PRP Organized Group ("OPOG").

The Site is a former refrigerant/solvent recycling operation in Whittier, California. During a Site Assessment in 1995, EPA observed in excess of 3,000 drums at the Site in various stages of deterioration. Data gathered in 1988 and 1995 also indicated the presence of hazardous substances including but not limited to methylene chloride, tetrachloroethylene, trichloroethylene, and Freon 11 and 113, in the subsurface soils and groundwater at the Site. On May 3, 1995, EPA issued an Action Memorandum authorizing actions necessary to abate imminent and substantial endangerments at the Site, including securing the site, conducting sampling, removing grossly contaminated equipment, structures, and debris, removing containerized wastes and disposing, stabilizing or treating grossly contaminated soils.

On May 9, 1995 and August 31, 1995, EPA issued Unilateral Administrative Orders ("UAO") to approximately 170 major generator potentially responsible parties (PRPs), all of whom sent greater than 10 tons of hazardous materials to the Site, to perform removal activities at the Site. These major contributing parties thereafter formed a workgroup called the Omega Chemical Site PRP Organized Group or "OPOG" and completed removal activities as required. In September 1998, EPA proposed the Site for listing on the National Priorities List ("NPL"). The Site was placed on the NPL on January

19, 1999.

Currently, the 109 members within OPOG are performing work under a Partial Consent Decree which was entered by the District Court on February 23, 2001. Under this agreement, the Settling Defendants agreed to pay a portion of past costs and perform the following work at the Site:

- 1) implementation of a Remedial Investigation / Feasibility Study ("RI/FS") for contamination in the vadose zone within the "Phase 1A area" of the Site;
- 2) performance of an Engineering Evaluation and Cost Analysis ("EE/CA") addressing groundwater contamination in the Phase 1A area;
- 3) implementation of the response action selected in EPA's Action Memorandum at the conclusion of the EE/CA;
- 4) performance of a risk assessment within the Phase 1A area; and
- 5) installation of up to three groundwater monitoring wells at locations downgradient of the Phase 1A area and upgradient of the City of Santa Fe Springs water supply well.

In addition, EPA has been conducting a Fund-lead groundwater RI downgradient of the "Phase 1A" area. In the future, EPA anticipates combining the Fund-lead groundwater RI and the PRP-lead groundwater EE/CA into one PRP-lead FS. At the conclusion of the FS, a Sitewide remedy would be proposed and selected.

Based upon generator manifest information, EPA is notifying you that you are a potentially responsible party at the Omega Site. EPA has reviewed the State of California's manifest database information and determined that you contributed more than 10 tons of waste to the Site and thus fall into the major contributors' group. Although you were not identified during earlier reviews of the generator manifests for Omega, your potential liability at the Site is equivalent to those parties which received notice in 1995 and have been performing work to date, and you may be liable for past and future costs incurred to clean up the Site. A summary of the manifest information attributed to you is provided as Attachment A. Copies of the original manifests may be viewed at the offices of:

Department of Toxic Substances Control  
8800 Cal Center Drive  
Sacramento, CA 95826-3200  
(916) 255-0883  
Attention: Adrienne Sanders, DTSC

If, upon your review of this information, you conclude that the volume attributed to you is incorrect, please notify the EPA in writing, providing documents substantiating that claim by close of business December 18, 2002. This correspondence should be addressed to:

Elizabeth Domagalski  
U.S. Environmental Protection Agency  
Superfund Division

75 Hawthorne Street, SFD-7  
San Francisco, CA 94105

Under CERCLA Section 107(a)(3), any person who arranged for the disposal of hazardous substances at a facility from which there is a release, or threatened release of a hazardous substance, shall be liable for costs incurred by EPA to respond to such releases. 42 U.S.C.A. § 9607(a)(3). Furthermore, EPA may unilaterally issue such orders as may be necessary to protect public health and welfare and the environment under CERCLA Section 106(a), including, but not limited to, orders to perform response actions at Site. 42 U.S.C.A § 9606(a). EPA is not issuing you an Order at this time, but is advising you of your potential liability at this site. EPA encourages you to initiate dialog with OPOG concerning joining the established workgroup. The Agency is willing to amend the existing Partial Consent Decree to include any parties which join the established group.

#### September 2002 Meeting

On September 17, 2002, EPA will conduct an informational meeting for all newly identified major contributing parties at the Site. The meeting will occur at 1:00 p.m. at the following address:

Omega Meeting  
1:00p.m.-5:00p.m. Catalina Clemente Room

Sheraton Gateway Hotel, Los Angeles Airport  
6101 West Century Blvd.  
Los Angeles, CA 90065  
(310) 642-1111

EPA will make a presentation, which will be followed by an opportunity for parties to ask questions. Immediately following the question period, all newly identified parties will have an opportunity to meet with OPOG representatives to discuss joining the established workgroup. In addition to the informational meeting, EPA representatives will be available on the following day, September 18, 2002, from the hours of 9:00 a.m. to 12:00 noon, to answer individual questions you may have concerning the Site. The location of this break out session will be in Salon Room Number 214 at the Sheraton Gateway Hotel.

If you have any technical questions regarding the Site, you may contact Nancy Riveland-Har, the Remedial Project Manager, at 415-972-3251. If you have any legal questions, you may contact Thanne Cox, the Assistant Regional Counsel, at 415-972-3908. EPA's anticipates your presence and participation at the September 2002 meeting.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Kemmerer", written in a cursive style.

John Kemmerer, Chief  
Site Cleanup Branch

cc: Thanne Cox, EPA ORC  
Nancy Riveland-Har, EPA RPM  
Elizabeth Domagalski, EPA  
Lois Green, EPA  
Lewis Maldonado, EPA ORC  
Loren Henning, EPA  
Karl Fingerhood, DOJ  
Adrean Sanders, DTSC

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generator\_name            PATTON DIV OF ALFORD IND INC

lc\_name:                Engraph, Inc.

lc\_calc\_volume:        20.8833    tons

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manifest_number	manifest_quantity_ton
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08270911	0.3753 tons
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08271360	0.5004 tons
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83029686	0.6255 tons
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83029755	0.7506 tons
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83029796	0.3753 tons
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83029904	0.6255 tons
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83212303	1.0008 tons
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83410772	0.6255 tons
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83493828	0.7506 tons
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83493833	0.2502 tons
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83564119	0.2502 tons
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83564138	0.6255 tons
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84341352	0.7506 tons
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84341509	0.7506 tons
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84341600	0.7506 tons
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84341712	0.7506 tons
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84341990	0.075 tons
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84345237	0.7506 tons
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86534439	0.8757 tons
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86534625	0.6255 tons
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86544111	1.0008 tons
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87114035	0.3753 tons
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87114302	0.6255 tons
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87118520	0.5004 tons
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87118658	0.9174 tons
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87118894	1.251 tons
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87118934	0.5004 tons
87119179	0.7506 tons
87119398	0.8757 tons
87119501	0.5004 tons
88293422	0.6255 tons
88293667	0.6255 tons
88677497	0.2502 tons

ENGRAPH, INC.

United States


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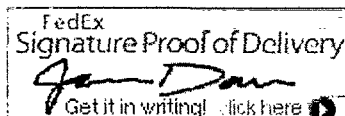
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**Tracking Number** 478253983502  
**Reference Number** 06-5026-08-0332-136 EPA  
**Ship Date** 08/08/2002  
**Delivered To** Recipient  
**Delivery Location** ATLANTA GA  
**Delivery Date/Time** 08/12/2002 10:58  
**Signed For By** M RICHARDSON  
**Service Type** FedEx 2Day Letter

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DeliveredATLANTA GA	08/12/2002 10:58	No signature required - release waiver on file
On FedEx vehicle for deliveryATLANTA GA	08/12/2002 08:09	
Package statusATLANTA GA	08/10/2002 09:29	Package not due for delivery
Arrived at FedEx Destination LocationATLANTA GA	08/10/2002 09:29	
Left FedEx RampHAPEVILLE GA	08/10/2002 08:56	
Arrived at FedEx RampHAPEVILLE GA	08/10/2002 05:47	
Left FedEx Sort FacilityMEMPHIS TN	08/09/2002 16:43	
Left FedEx Sort FacilityMEMPHIS TN	08/09/2002 14:05	
Left FedEx Sort FacilityOAKLAND CA	08/09/2002 07:11	
Left FedEx Origin LocationOAKLAND CA	08/08/2002 19:28	
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